

EXHIBIT B

IN RE: NEURONTIN MARKETING, SALES)
PRACTICES AND PRODUCTS LIABILITY)
LITIGATION)

THIS DOCUMENT RELATES TO:

05-CV-11515

June 8, 2007

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Also Present: Jason Powers, Videographer

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The deposition of PAMELA KRANCER, APN, taken on behalf of the Plaintiffs, on the 8th day of June, 2007, in the offices of Howell Allen Clinic, 2011 Murphy Avenue, Suite 401, Nashville, Tennessee, for all purposes under the Federal Rules of Civil Procedure.

The formalities as to notice, caption, certificate, et cetera, are waived. All objections, except as to the form of the questions, are reserved to the hearing.

It is agreed that Elisabeth A. Miller, being a Notary Public and Court Reporter for the State of Tennessee, may swear the witness, and that the reading and signing of the completed deposition by the witness are waived.

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PAMELA KRANCER, APN, was called as a witness, and after having been first duly sworn, testified as follows:

1 Q. Do you recall as you sit here whether --
 2 when you prescribed, back in 2004, Neurontin for
 3 Mr. Smith, whether there were any warnings or
 4 precautions in the Neurontin label regarding
 5 suicide or depression?
 6 A. I don't remember.
 7 Q. Okay. And that's fair. I just want to
 8 make sure.
 9 A. Yeah.
 10 Q. Y'all -- you work in a neurosurgeon's
 11 office, correct?
 12 A. Yes, sir.
 13 Q. And you worked at neurosurgeon's office
 14 back in 2004, the time period we're talking about?
 15 A. Yes, sir.
 16 Q. Neurosurgeons, I guess, by definition, are
 17 brain surgeons?
 18 A. Yes, sir.
 19 Q. And as people who work on the brain, is it
 20 fair to say they -- that they sometimes need to
 21 prescribe antiseizure medications?
 22 A. Yes.
 23 Q. Antiepileptic drugs, correct?
 24 A. Yes, sir.
 25 Q. Or sometimes referred to as AED's?

1 A. Yes, sir.
 2 Q. And, in fact, in your office back in the
 3 2004 time period, did y'all use Neurontin as an
 4 antiepileptic drug?
 5 A. Yes, sir, we did.
 6 Q. When I say you, I mean did y'all
 7 prescribe, for your patients, Neurontin as an
 8 antiepileptic drug?
 9 A. Yes, sir.
 10 Q. Mr. Lanier asked you whether the territory
 11 or the pharmaceutical representatives talked about
 12 the affect of Neurontin on norepinephrine or
 13 serotonin. Is it fair to say that generally when
 14 you talked to pharmaceutical representatives about
 15 medications, you don't talk in detail about the
 16 pharmacology of the drug?
 17 A. Usually not. And a lot of times, if it's
 18 to present us with new literature, you know, they
 19 bring articles. And I can't say with Neurontin
 20 they did that, but a lot of times they bring us
 21 new literature, new information on medication,
 22 things like that. But for the most part, you
 23 know, it's -- it's just to talk to them, make sure
 24 we're not having any trouble with the medication.
 25 And, you know, at the time, Neurontin was

1 very expensive, and samples were very important to
 2 our patients, because it was -- so, you know.
 3 That's just it.

4 Q. Fair enough.

5 MR. FERGUSON: Thank you very much
 6 for your time Ms. Krancer. I'll pass the witness.

7 How much time?

8 THE VIDEOGRAPHER: 14, 51 is what you
 9 have used.

EXAMINATION

11 BY MR. LANIER:

12 Q. Do you yourself treat epileptics?

13 A. We treat patients with brain tumors that
 14 are on prophylactic medication for seizures.

15 Q. When you have been visited by the sales
 16 folks from the Neurontin drug, have they detailed
 17 you on using it for pain relief like you were
 18 doing for Mr. Smith?

19 A. I can't remember -- I don't remember that,
 20 and I have to be honest.

21 Q. That's okay.

22 In some of the notes that they put on
 23 here --

24 A. Because I --

25 Q. Go ahead.

1 A. I don't remember when it was for herpetic
 2 pain, and -- I mean, there's been a lot of
 3 transition with the medication, and I don't
 4 remember the chronologic changes with the drug.
 5 Q. Okay.
 6 A. That's just being honest. So when the
 7 drug changed, it's what we were using it for. I'm
 8 not sure I can tell you exactly the date when all
 9 that happened.
 10 Q. Mr. Smith was not epileptic, was he?
 11 A. No.
 12 Q. You weren't prescribing it for him for
 13 epilepsy, were you?
 14 A. No.
 15 Q. You were prescribing it for him for pain
 16 relief?
 17 A. Neuropathic pain relief.
 18 Q. Did you know that was an off-label
 19 prescription?
 20 A. Yes.
 21 Q. I was assuming that a drug rep or someone
 22 had told you that it was useful for pain relief or
 23 could be used in that way. Is that something you
 24 got on your own, or is that something that came
 25 from a -- were you detailed to that?